

EPA Permit Review Notes

Source Name/Address:	Graph-Pak Corporation 11250 Addison Avenue Franklin Park, Illinois 60131
Located in an EJ area?	Yes
Permit No.	08060064
Permit Type/Stage:	FESOP/Draft
IEPA Permit Writer:	David Hulskotter (217) 785-7095 David.Hulskotter@illinois.gov
Date Review Completed:	4/24/14
EPA Reviewer:	David Ogulei

Brief Summary of Permit/Source:

The Graph-Pak Corporation is a flexographic printing press. The facility is comprised of three sheet fed offset presses, two flexographic web presses and five gluers. The printing inks, glues and solvents contain organic solvents which are emitted to the atmosphere during the printing process as volatile organic material (VOM). These materials also contain components that are considered hazardous air pollutants (HAPs). The permit limits HAP emissions to 8 tpy for any single HA and 15 tpy for total HAPs.

Comments/Questions/Observations:

Permit says the source is not subject to 40 C.F.R. Part 63, Subpart KK, because the permit limits the PTE of the source to less than 10 tpy of a single HAP and less than 25 tpy of all HAPs combined. Condition 4a. However, 40 C.F.R. § 63.820(a) states that 40 C.F.R. Part 63, Subpart KK, applies to:

(2) Each new and existing facility at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses are operated for which the owner or operator chooses to commit to and meets the criteria of paragraphs (a)(2)(i) and (ii) of this section for purposes of establishing the facility to be an area source of HAP with respect to this subpart. A facility which establishes area source status through some other mechanism, as described in paragraph (a)(7) of this section, is not subject to the provisions of this subpart.

- (i) Use less than 9.1 Mg (10 tons) per each rolling 12-month period of each HAP at the facility, including materials used for source categories or purposes other than printing and publishing, and
- (ii) Use less than 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing and publishing.

40 C.F.R. § 63.820(a)(7) states:

(7) Nothing in this paragraph is intended to preclude a facility from establishing area source status by limiting its potential to emit through other appropriate mechanisms that may be available through the permitting authority.

Do the synthetic minor limits in the draft FESOP qualify under 40 C.F.R. § 63.820(a)(7) or 40 C.F.R. § 63.820(a)(2)? If under 40 C.F.R. § 63.820(a)(2)